

August 31, 2017

VIA ECFS

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: Telephone Number Portability, et al.  
CC Docket No. 95-116; WC Docket Nos. 09-109 and 07-149**

Dear Secretary Dortch:

The North American Portability Management LLC (the "NAPM LLC"), by its attorneys, hereby files a written summary of the NAPM LLC's status updates to the Federal Communications Commission ("FCC" or "Commission") regarding the transition from the current local number portability administrator ("LNPA"), Neustar, to the new LNPA, Telcordia d/b/a iconectiv (the "Report").<sup>1</sup> This Report updates the FCC, the public, and all interested stakeholders regarding transition activities to date in accordance with requirements of the LNPA Selection Order<sup>2</sup> and guidance received from the FCC on June 24, 2015.<sup>3</sup> The NAPM LLC will continue to file written updates of this Report with the FCC at the end of each month until transition is complete.

### **Transition Oversight Plan**

The Transition Oversight Plan ("TOP"), dated August 31, 2015 was edited and refiled December 5, 2016, and the TOP is published on the public portion of the NAPM LLC's website at [www.NAPMLLC.org](http://www.NAPMLLC.org).<sup>4</sup> Although one or more transition milestone dates may be adjusted as appropriate to mitigate risk, the previously published dates remain accurate, and the transition is currently on track to meet the Final Acceptance Date of May 25, 2018.

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<sup>1</sup> This Report is intended to provide an update with respect to events that occurred during the prior month. Although the monthly Reports may, at times, reflect certain developments that occurred between the end of the month for which the Report is filed and the date upon which the draft Report received final approval by the NAPM LLC for filing with the Commission, the Reports generally do not reflect all developments that occur during the month in which the Report is filed, which will be reflected in the Report for the following month. Please review previous Reports for information about previous developments.

<sup>2</sup> *Telcordia Technologies, Inc. Petition to Reform Amendment 57 and to Order a Competitive Bidding Process for Number Portability Administration et al.*, Order, WC Docket Nos. 07-149, 09-109, CC Docket No. 95-116, ¶¶ 158-59 (rel. Mar. 27, 2015) (*LNPA Selection Order*).

<sup>3</sup> This summary reflects information relevant to the transition as managed by the NAPM LLC with the assistance of the TOM and the oversight of the Commission.

<sup>4</sup> See [https://www.napmlc.org/Docs/npac/ref\\_docs/08%2031%2015%20-%20Updated%20Transition%20Oversight%20Plan.pdf](https://www.napmlc.org/Docs/npac/ref_docs/08%2031%2015%20-%20Updated%20Transition%20Oversight%20Plan.pdf).

## **Stakeholder Outreach and Education**

Since the last Report, the Transition Oversight Manager (the "TOM") presented transition updates at the following events:

- The July LNPA WG on July 11, 2017 and July 12, 2017 in Durham, NC;
- The July TOEP Webcast on July 19, 2017 which was attended by 169 participants; and
- The NAPM LLC in Denver, CO on July 25, 2017.

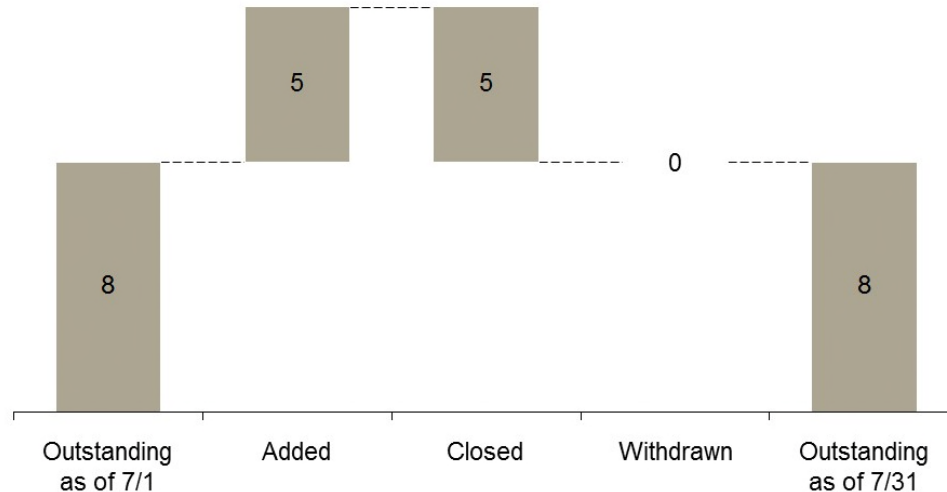
## **TOM Transition Activities**

The TOM continued to advance the objectives of the LNPA transition program in July. The accomplishments in July include:

- Confirmed PAS API beta release on July 31, 2017;
- Monitored industry testing of the new Number Portability Administration Center (NPAC):
  - 13 vendor systems under test (SUTs) in testing;
  - 1 service provider SUT initiated testing;
  - 2 vendor SUTs have completed certification as of July 31, 2017;
- Verified that 45 of 58 Industry Methods and Procedures (M&P) were approved and 2 are under review;
- Secured FCC approval of the Billing Acceptance Test Plan (ATP) and facilitated FCC review of the Enhanced Law Enforcement Platform (ELEP) ATP;
- Verified the transition of NPAC Change Management Administration role from Neustar to iconectiv on July 31, 2017;
- Hosted an industry Contingency Rollback session on July 12, 2017 to introduce the industry-led rollback approach and solicit feedback from industry stakeholders. There were 29 attendees present for the session and 90 attended via teleconference; feedback was requested by July 26<sup>th</sup>; and
- Launched the July TOEP survey on July 24, 2017 which will continue through August 7, 2017. The purpose of the survey is to solicit feedback on the transition, with a focus on testing. As of July 31, 2017, 71 responses have been received.

The TOM conducts weekly meetings with the NAPM LLC Transition Team, iconectiv and Neustar to coordinate activities and communication across the parties and address ad hoc issues as they arise. These working meetings are used to identify, discuss and close tasks (A.K.A. action items) required to advance the project objectives. The graph below depicts the progress achieved in addressing these action items since the last monthly report.

### Transition Action Item Progress (7/1/17 through 7/31/17)



The TOM continues to track identified LNPA transition risks including the summary program risks below:

- Lack of agreement on key transition requirements has prevented certain transition plans from being finalized;
- Agreement of appropriate contractual obligations governing contingency rollback and parallel operations;
- Delays in onboarding the one remaining mechanized service bureau threatens the on-time completion of mechanized user testing;
- There is little remaining buffer in the Release B development schedule to absorb delays and/or unplanned development activities arising from FRS variances like the NOT Filter or post-July PAS API updates;
- Testing has uncovered issues which are categorized as undocumented features, inadequate documentation, and differences in interpretation. Additional development by iconectiv, if required, will add to existing schedule pressure;
  - There are 18 issues identified related to the categories above, of which 10 issues have been brought to the LNPA WG in the form of Problem Issue Management Statements (PIMs) for resolution. The other 8 issues are under investigation; and
- Vendor testing identified instances in which Vendor systems under test do not appear to be in strict compliance with the NPAC interface specifications. Prolonged testing and deployment of upgrades or patches, if necessary, may delay the completion of testing or require testing activities to be re-sequenced;
  - A total of 24 Vendor testing incidents are under investigation. Resolution timeliness of incidents, several of which date to early June, may cause delay in service provider testing of their mechanized interfaces.

**iconectiv**

On July 25, 2016, the FCC released a final decision approving the recommendation of the NANC that iconectiv serve as the next LNPA and the terms and conditions of the draft Master Services Agreement ("MSA") that the NAPM LLC and iconectiv had previously submitted to the FCC.<sup>5</sup> On August 8, 2016, the NAPM LLC and iconectiv executed the MSA. On September 21, 2016, iconectiv held the first of several planned LNPA Transition onboarding webcasts for Service Providers, Service Bureaus and Providers of Telecom Related Services. In addition, iconectiv is moving forward with meeting the requirements and deadlines set forth in the Master Services Agreement.

iconectiv continued to on-board users to its new NPAC platform. Current on-boarding status as of July 31, 2017 shows:

- ~70% of SP/SB/PTRS users have started the on-boarding process;
- 1,044 NPAC users have completed registration;
- 12 of 13 Service Bureaus have completed on-boarding (see transition risk tracking above);
- All LSMS and SOA vendors have executed the vendor testing and confidentiality agreements;
- 22 WDNC entities have started registration and 16 WDNC entities have completed registration;
- 54% of ELEP entities have responded to initial outreach, and 22% of ELEP entities have completed registration forms and are processing the service agreements; and
- Public Safety / IVR registration was launched in 8 states representing 1,845 agencies and 251 completed registration.

For information from iconectiv about the NPAC transition, please send an email to **[LNPA-ACCT-MGMT@iconectiv.numberportability.com](mailto:LNPA-ACCT-MGMT@iconectiv.numberportability.com)**

**Neustar**

Neustar began billing industry service providers on their December 2015 monthly Statement of Work ("SOW") invoices for transition service support billable since July 2015, consistent with the terms of SOW 97. In addition, the four-way non-disclosure agreement, which facilitates joint vendor meetings to discuss transition related issues, was signed by Neustar, the NAPM, the TOM, and iconectiv on February 2, 2017. Lastly, Neustar has executed the appropriate User Agreement with iconectiv, and is taking steps to complete the vendor on-boarding process.

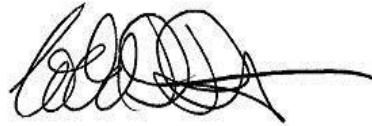
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<sup>5</sup> See *Telcordia Technologies, Inc. Petition to Reform Amendment 57 and to Order a Competitive Bidding Process for Number Portability Administration et al.*, Order, WC Docket Nos. 07-149, 09-109, CC Docket No. 95-116 (rel. July 27, 2015) (*LNPA Approval Order*).

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Please contact the undersigned if you have any questions or would like any additional information about the issues discussed herein.

Sincerely,

A handwritten signature in black ink, appearing to read "Todd D. Daubert", with a long horizontal flourish extending to the right.

Todd D. Daubert  
*Counsel to the NAPM LLC*